

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

CHRISTIAN ALBERTO SANTOS GARCIA,
et al.,

Plaintiffs,

v.

ALEJANDRO MAYORKAS, *et al.*,

Defendants.

Case No. 1:20-cv-00821 (LMB/JFA)

**JOINT NOTICE REGARDING STATUS OF SETTLEMENT
BETWEEN PLAINTIFFS AND FARMVILLE DEFENDANTS**

Plaintiffs and Defendants Immigration Centers of America - Farmville, LLC and Jeffrey Crawford ("Farmville Defendants" or collectively with Plaintiffs, the "Settling Parties"), by counsel, hereby jointly notify this Court as follows:

1. By Joint Motion to Stay Briefing and Continue the Hearing on Motions for Summary Judgment Relating to Counts II and III ("Motion to Stay," ECF No. 189), filed on July 23, 2021, the Parties notified the Court that they had resolved in principle all matters in this litigation as between and among them and required a brief period of not more than 30 days to effectuate a settlement agreement.
2. By Order entered July 23, 2021 (ECF No. 190), the Court granted the Motion to Stay.
3. The Settling Parties reached agreement on the form of a written settlement agreement on August 3, 2021.

4. The Farmville Defendants executed the written settlement agreement on August 4, 2021, and counsel for Farmville Defendants currently holds those signatures in escrow pending Plaintiffs' full execution of the written agreement.

5. As of August 23, 2021, counsel for Plaintiffs have obtained a majority of the Plaintiffs' signatures and anticipate obtaining the remainder no later than September 3, 2021. Counsel for Plaintiffs will hold these signatures in escrow until they obtain all 14 signatures.

6. The Settling Parties anticipate that Plaintiffs' counsel will obtain all remaining signatures and counsel will release their clients' respective signatures from escrow no later than September 3, 2021.

7. The Settling Parties anticipate that they will submit a stipulation of dismissal of all claims against Farmville Defendants, with prejudice, no later than September 17, 2021.

WHEREFORE, the Settling Parties respectfully inform the Court of the foregoing.

Dated: August 23, 2021

Respectfully submitted,

Joseph D. West (VSB No. 16834)
David Debold (*pro hac vice*)
Naima L. Farrell (*pro hac vice*)
Thomas J. McCormac IV
(*pro hac vice*)
Blair Watler (*pro hac vice*)
Katherine King (*pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5306
Tel: 202-955-8551
jwest@gibsondunn.com
ddebold@gibsondunn.com
nfarrell@gibsondunn.com
tmccormac@gibsondunn.com
bwatler@gibsondunn.com
kking@gibsondunn.com

By: /s/ Simon Sandoval-Moshenberg
Simon Sandoval-Moshenberg (VSB No. 77110)
Kristin Donovan (VSB No. 92207)
Granville Warner (VSB No. 24957)
LEGAL AID JUSTICE CENTER
6066 Leesburg Pike, Suite 520
Falls Church, VA 22041
Tel: 703-778-3450
simon@justice4all.org
kristin@justice4all.org
cwarner@justice4all.org

Sirine Shebaya (*pro hac vice*)
Amber Qureshi (*pro hac vice*)
NATIONAL IMMIGRATION PROJECT OF THE
NATIONAL LAWYERS GUILD
2201 Wisconsin Avenue, N.W., Suite 200
Washington, D.C. 20007
Tel: 617-227-9727
sirine@nipnl.org
amber@nipnl.org

/s/ John M. Erbach
John M. Erbach (VSB No. 76695)
Email: jerbach@spottsfain.com
Patricia Bugg Turner (VSB No. 72775)
Email: pturner@spottsfain.com
Kasey L. Hoare (VSB No. 92289)
khoare@spottsfain.com
Spotts Fain, P.C.
411 E. Franklin Street, Suite 600
Richmond, VA 23219
(804) 697-2000
(804) 697-2100 (Facsimile)
*Counsel for Defendants Jeffrey Crawford and
Immigration Centers of America - Farmville, LLC*